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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,)
13 Plaintiff,)
14 v.)
15 RENATO MENDOZA MEDINA,)
16 a/k/a Rene Mendoza Medina,)
17 PHYLLIS REYES CUISON,)
18 a/k/a Phyllis Cundangan Reyes, and)
RAWLIN CUNDANGAN REYES,)
19 Defendants.)

No. CR 06-0144 JSW

**STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
EXCLUSION OF TIME**

20 The defendants came before the Court for an initial status appearance on March 23, 2006.
21 The matter was set over until April 20, 2006 at 2:30 p.m. before the Court for a status hearing.
22 The parties agreed, and the Court found, that the time between March 23, 2006 and April 20,
23 2006 is properly excluded under the Speedy Trial Act, Title 18, United States Code, Sections
24 3161(h)(8)(A) and (h)(B)(ii) and (iv). The parties agreed, and the Court found that, that the case
25 was complex, due to the nature of the crime, the number of different entities, bank accounts, and
26 identities involved, and the large amount of discovery which the defense needs to review. Due to
27 the complexity of this matter, failure to grant the requested continuance would unreasonably
28 deny the defense the reasonable time necessary for effective preparation. The parties agree that
the continuance from March 23, 2006 until April 20, 2006 is also necessary due to continuity of

1 defense counsel, given the need for defense counsel to spend time preparing other cases during
2 this time period. The parties agree that the ends of justice served by granting the requested
3 continuance outweigh the best interest of the public and the defendants in a speedy trial.

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5 DATED: March 28, 2006

/s/ Christina Hua
CHRISTINA HUA
Assistant United States Attorney

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8 DATED: March 28, 2006

/s/ Cristina Arguedas
CRISTINA C. ARGUEDAS
Counsel for Renato Mendoza Medina

9

10 DATED: March 28, 2006

/s/ Lidia Stiglich
LIDIA STIGLICH
Counsel for Rawlin Cundangan Reyes

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13 DATED: March 28, 2006

/s/ Ann Moorman
ANN MOORMAN
Counsel for Phyllis Reyes Cuisin

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15 ORDER
16 For the foregoing reasons, and as stated on the record at the March 23, 2006 hearing in this
17 matter, the Court HEREBY ORDERS the period between March 23, 2006 and April 20, 2006
18 excluded from the speedy trial calculation under Title 18, United States Code, Sections
19 3161(h)(8)(A) and (h)(B)(ii) and (iv). The Court finds that the failure to grant the requested
20 continuance would unreasonably deny defense counsel the reasonable time necessary for
21 effective preparation, given the complexity of this case and the need for continuity of counsel.
22 The Court finds that the ends of justice served by granting the requested continuance outweigh
23 the best interest of the public and the defendant in a speedy trial and in the prompt disposition of
24 criminal cases.

25 IT IS SO ORDERED.

26 DATED: March 30, 2006


JEFFREY S. WHITE
United States District Judge

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